

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES)	
CORPORATION,)	
)	
Plaintiff,)	C.A. No. 16-122-LPS
)	
v.)	JURY TRIAL DEMANDED
)	
GROUPON, INC.,)	
)	
Defendant.)	

**IBM’S MOTION FOR SUMMARY JUDGMENT OF NO ANTICIPATION BY
HYPERCARD AND NO OBVIOUSNESS IN VIEW OF HYPERCARD AND TERRY
FOR THE ASSERTED CLAIMS OF U.S. PATENT NO. 5,796,967**

Plaintiff International Business Machines Corporation (“IBM”) hereby moves for summary judgment of no anticipation by HyperCard and no obviousness in view of HyperCard and Terry for the asserted claims of U.S. Patent No. 5,796,967. Attached hereto is a proposed order granting summary judgment of no anticipation by HyperCard and no obviousness in view of HyperCard and Terry for the asserted claims of U.S. Patent No. 5,796,967. The grounds for IBM’s motion are set forth in its brief in support filed concurrently herewith.

Respectfully submitted,

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